

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	Cr. No. 3:06-CR-151-MEF
)	
JEFFREY DOUGLAS COSBY)	

UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE GOVERNMENT'S RESPONSE

Comes now the United States of America, by and through Leura Garrett Canary, United States Attorney for the Middle District of Alabama, and respectfully requests an extension of time to file the its response to defendant's Motion to Suppress. In support thereof, we would show the following:

1. The response of the United States, pursuant to the Order on Arraignment issued in this case was due to be filed on July 27, 2006.

2. The parties made the Court aware at the Pre-trial Conference held on July 17, 2006, that additional evidence would be provided to the defense and based upon representation and belief of the parties, additional or supplemental motions would need to be filed by the defense upon receipt and review of that discovery, to include a Supplemental Motion to Suppress.

3. The government has, today, received a report of a forensic examination of electronic equipment, computer hardware and software, seized pursuant to a search warrant executed at the residence of the defendant, and is in the process of copying and distributing it to the defendant. The undersigned AUSA has been told that a cd/dvd, containing additional evidence, will be sent to the government by August 4, 2006.

4. The undersigned has contacted Kevin L. Butler, attorney for defendant, and believes

that he has no objection to this request.

5. The defendant will not suffer any prejudice should the Court grant this motion.

For the reasons stated above, the United States requests that this Honorable Court grant an extension to file the government's response brief until after the Supplemental Motion to Suppress is filed by the defense or until 5 days after receiving notice from the defendant that no supplemental motion will be filed.

Respectfully submitted this the 2nd day of August, 2006.

LEURA G. CANARY
UNITED STATES ATTORNEY

/s/ Susan R. Redmond
SUSAN R. REDMOND
Assistant United States Attorney
Post Office Box 197
Montgomery, Alabama 36101-0197
334.223.7280
334.223.7135 fax
susan.redmond@usdoj.gov

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	Cr. No. 3:06-CR-151-MEF
)	
JEFFREY DOUGLAS COSBY)	

CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Kevin L. Butler.

Respectfully submitted,

LEURA GARRETT CANARY
UNITED STATES ATTORNEY

/s/ Susan R. Redmond
SUSAN R. REDMOND
Assistant United States Attorney
One Court Square, Suite 201
Montgomery, Alabama 36104
Telephone: (334) 223-7280
Fax: (334) 223-7135
susan.redmond@usdoj.gov